


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

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WILLIAM M. McCOOL, Clerk
By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CR15- 386 JLR

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANGEL SANDOVAL MONDRAGON,
MARBELLA SANDOVAL MONDRAGON,
MIGUEL ARCEF-FLORES, and
MONICA ARCEF-FLORES,

Defendants.

NO.

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(Forced Labor and Attempted Forced Labor)

Beginning in or about December 2004, and continuing through in or about June 2008, in King County, within the Western District of Washington and elsewhere, defendants ANGEL SANDOVAL MONDRAGON, MARBELLA SANDOVAL MONDRAGON, MIGUEL ARCEF-FLORES, and MONICA ARCEF-FLORES, aiding and abetting each other, did knowingly provide and obtain, and attempt to provide and obtain, the labor and services of M.C.R., a national of Mexico whose identity is known to

SANDOVAL MONDRAGON et al./INDICTMENT - 1

UNITED STATES ATTORNEY
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SEATTLE, WASHINGTON 98101
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1 the grand jury, by threats of serious harm to, and physical restraint against, M.C.R. and
2 another person; and by means of a scheme, plan, and pattern intended to cause M.C.R. to
3 believe that if she did not perform such labor and services, she and another person would
4 suffer serious harm and physical restraint; and by means of the abuse and threatened
5 abuse of law and the legal process.

6 The Grand Jury further alleges that the violation included aggravated sexual abuse
7 and the attempt to commit aggravated sexual abuse.

8 All in violation of Title 18, United States Code, Sections 2 and 1589 (2000).

9 **COUNT TWO**
10 **(Human Trafficking)**

11 Beginning in or about December 2004, and continuing through in or about June
12 2008, in King County, within the Western District of Washington and elsewhere,
13 defendants ANGEL SANDOVAL MONDRAGON, MARBELLA SANDOVAL
14 MONDRAGON, MIGUEL ARCEF-FLORES, and MONICA ARCEF-FLORES, aiding
15 and abetting each other, did knowingly recruit, harbor, transport, provide, and obtain
16 another person, M.C.R., a national of Mexico whose identity is known to the grand jury,
17 for labor and services, by threats of serious harm to, and physical restraint against,
18 M.C.R. and another person; and by means of a scheme, plan, and pattern intended to
19 cause M.C.R. to believe that if she did not perform such labor and services, she and
20 another person would suffer serious harm and physical restraint; and by means of the
21 abuse and threatened abuse of law and the legal process.

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1 The Grand Jury further alleges that the violation included aggravated sexual abuse
2 and the attempt to commit aggravated sexual abuse.

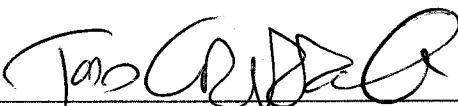
3 All in violation of Title 18, United States Code, Sections 2 and 1590 (2000).
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5 A TRUE BILL:

6 DATED: 3 Dec, 2015

7 *Signature of foreperson redacted*
8 *pursuant to the policy of the Judicial*
9 *Conference of the United States*

10 FOREPERSON

11 
12 ANNETTE L. HAYES
13 United States Attorney

14 
15 TODD GREENBERG
16 Assistant United States Attorney

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18 CATHERINE L. CRISHAM
19 Assistant United States Attorney
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